

WIRELESS BROADBAND OPERATORS COALITION
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Via Electronic Filing

November 30, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, N.W.
Washington, D.C. 20554

Re: *ET Docket No. 04-186*

Dear Ms. Dortch:

On behalf of the Wireless Broadband Operators Coalition ("WBOC"), I request that the attached copy of the WBOC's initial comments in the Commission's "cognitive radio" docket (ET Docket No. 03-108) be incorporated into the record for ET Docket No. 04-186, as the WBOC's response to the Commission's *Notice of Proposed Rulemaking* (FCC 04-113) ("*NPRM*") for that proceeding. The attached comments are being submitted to address the issues raised in paragraph 25 of the *NPRM*, where the Commission requests comment on the appropriate power and antenna gain limits for point-to-multipoint operations in the vacant television spectrum below 900 MHz. WBOC's comments include a proposal for more spectrally efficient power/antenna gain limits for point-to-multipoint operations in the unlicensed 902-928 MHz, 2.4 GHz, and 5.8 GHz bands. Because the proposal can achieve similarly efficient results in the vacant television bands below 900 MHz, WBOC asks that it be considered for that spectrum as well. WBOC will submit further details about its proposal once field testing of its technical model has been completed.

Respectfully submitted,

Douglas Campbell

Douglas Campbell
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